

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
LANDON ROTHSTEIN, JENNIFER :
DAVIDSON, ROBERT DAVIDSON, :
and IHOR KOBRYN, individually and :
on behalf of all others similarly situated, :
:
Plaintiffs, :
:
-against- :
:
ALLY FINANCIAL, INC. f/k/a GMAC :
INC., ALLY BANK f/k/a GMAC BANK, :
JOHN DOE CORPORATION, :
BALBOA INSURANCE COMPANY, :
MERITPLAN INSURANCE :
COMPANY, and NEWPORT :
MANAGEMENT CORPORATION, :
:
Defendants. :
:
-----X

12 Civ. 3412 (AJN)

**MOTION TO WITHDRAW THE APPEARANCE OF MATTHEW P. PREVIN AS
COUNSEL FOR DEFENDANTS BALBOA INSURANCE COMPANY, MERITPLAN
INSURANCE COMPANY, AND NEWPORT MANAGEMENT CORPORATION**

Pursuant to Local Rule 1.4, Defendants Balboa Insurance Company, Meritplan Insurance Company and Newport Management Corporation (collectively the “Balboa Defendants”) hereby move this Court for leave to withdraw the appearance of Matthew P. Previn as their counsel.

The Balboa Defendants will continue to be represented by Ross E. Morrison, Robyn C. Quattrone, and Katherine L. Halliday of BuckleySandler LLP. Notice has been given to the Balboa Defendants, Plaintiffs’ Counsel, and Counsel for the Ally Defendants with no objection. This motion to withdraw will not affect the Balboa Defendants, the other parties, or the progress of the case.

Dated: New York, New York
January 29, 2013

Respectfully submitted,

By: /s/ Matthew P. Previn
Matthew P. Previn
mprevin@buckleysandler.com
Ross E. Morrison
rmorrison@buckleysandler.com
BuckleySandler LLP
1133 Avenue of the Americas
Suite 3100
New York, New York 10036
Tel: (212) 600-2315
Fax: (212) 600-2405

Robyn C. Quattrone (*pro hac vice*)
rquattrone@buckleysandler.com
Katherine L. Halliday (*pro hac vice*)
khallday@buckleysandler.com
BuckleySandler LLP
1250 24th Street NW
Suite 700
Washington, DC 20010
Tel: (202) 349-8000
Fax: (202) 349-8080

*Attorney for Defendants Balboa
Insurance Company, Meritplan
Insurance Company, and Newport
Management Corporation*

CERTIFICATE OF SERVICE

Pursuant to the Federal Rules of Civil Procedure, I hereby certify that on the 29th day of January, 2013, I caused a true and correct copy of the foregoing to be served upon the following via the Court's ECF Notification System or by first class mail as indicated below.

By: /s Matthew P. Previn
Matthew P. Previn

SERVICE LIST

Mark A. Strauss mstrauss@kmlp.com Edward M. Varga evarga@kmlp.com J. Brandon Walker bwalker@kmlp.com KIRBY MCINERNEY LLP 825 Third Avenue 16th Floor New York, NY 10022 Telephone: (212) 371-6600 Facsimile: (212) 751-2540 <i>Counsel for Plaintiffs</i> Via CM/ECF	Richard G. Haddad rhaddad@oshr.com OTTERBOURG, STEINDLER, HOUSTON & ROSEN 230 Park Avenue New York, NY 10169 Telephone: (212) 661-9100 Facsimile: (212) 682-6104 <i>Counsel for Defendants Ally Financial, Inc. and Ally Bank</i> Via CM/ECF
James P. Novak 210 Interstate North Parkway, Suite 400 Atlanta, Georgia 30339 <i>General Counsel for the Balboa Defendants</i> VIA First Class Mail	

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
LANDON ROTHSTEIN, JENNIFER :
DAVIDSON, ROBERT DAVIDSON, :
and IHOR KOBRYN, individually and :
on behalf of all others similarly situated, :
:
Plaintiffs, :
:
-against- :
:
ALLY FINANCIAL, INC. f/k/a GMAC :
INC., ALLY BANK f/k/a GMAC BANK, :
JOHN DOE CORPORATION, :
BALBOA INSURANCE COMPANY, :
MERITPLAN INSURANCE :
COMPANY, and NEWPORT :
MANAGEMENT CORPORATION, :
:
Defendants. :
:
-----X

**[PROPOSED] ORDER GRANTING MOTION TO
WITHDRAW THE APPEARANCE OF MATTHEW P. PREVIN AS COUNSEL FOR
DEFENDANTS BALBOA INSURANCE COMPANY, MERITPLAN INSURANCE
COMPANY, AND NEWPORT MANAGEMENT CORPORATION**

This matter came before the Court on Defendants Balboa Insurance Company, Meritplan Insurance Company, and Newport Management Corporation's Motion to Withdraw the Appearance of Matthew P. Previn as their Counsel filed on January 29, 2012. It is hereby ORDERED that the Motion to Withdraw the Appearance of Matthew P. Previn as Counsel is GRANTED

IT IS SO ORDERED.

ALISON J. NATHAN
UNITED STATES DISTRICT JUDGE

Copies furnished to:
All Counsel of Record